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8 IN THE UNITED STATES DISTRICT COURT  
9 EASTERN DISTRICT OF CALIFORNIA  
10

11 UNITED STATES OF AMERICA,  
12 Plaintiff,  
13 v.  
14 APPROXIMATELY \$9,960.00 IN  
U.S. CURRENCY,  
15 Defendant.  
16

2:20-MC-00073-TLN-CKD

STIPULATION AND ORDER EXTENDING TIME  
FOR FILING A COMPLAINT FOR FORFEITURE  
AND/OR TO OBTAIN AN INDICTMENT  
ALLEGING FORFEITURE

17 It is hereby stipulated by and between the United States of America and potential claimant Tunisha  
18 Vance ("claimant"), by and through their respective counsel, as follows:

19 1. On or about January 10, 2020, claimant filed a claim in the administrative forfeiture  
20 proceeding with the U.S. Postal Inspection Service with respect to the Approximately \$9,960.00 in U.S.  
21 Currency (hereafter "defendant currency"), which was seized on October 26, 2019.

22 2. The U.S. Postal Inspection Service has sent the written notice of intent to forfeit required  
23 by 18 U.S.C. § 983(a)(1)(A) to all known interested parties. The time has expired for any person to file a  
24 claim to the defendant currency under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other than claimant has  
25 filed a claim to the defendant currency as required by law in the administrative forfeiture proceeding.

26 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for  
27 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant currency  
28 is subject to forfeiture within ninety days after a claim has been filed in the administrative forfeiture

1 proceeding, unless the court extends the deadline for good cause shown or by agreement of the parties.  
2 That deadline was April 9, 2020.

3 4. By Stipulation and Order filed April 1, 2020, the parties stipulated to extend to July 8, 2020,  
4 the time in which the United States is required to file a civil complaint for forfeiture against the defendant  
5 currency and/or to obtain an indictment alleging that the defendant currency is subject to forfeiture.

6 5. By Stipulation and Order filed July 1, 2020, the parties stipulated to extend to September 7,  
7 2020, the time in which the United States is required to file a civil complaint for forfeiture against the  
8 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to  
9 forfeiture.

10 6. By Stipulation and Order filed September 3, 2020, the parties stipulated to extend to  
11 November 6, 2020, the time in which the United States is required to file a civil complaint for forfeiture  
12 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject  
13 to forfeiture.

14 7. By Stipulation and Order filed October 30, 2020, the parties stipulated to extend to January  
15 5, 2021, the time in which the United States is required to file a civil complaint for forfeiture against the  
16 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to  
17 forfeiture.

18 8. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further extend to  
19 March 6, 2021, the time in which the United States is required to file a civil complaint for forfeiture against  
20 the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to  
21 forfeiture.

22 9. Accordingly, the parties agree that the deadline by which the United States shall be required  
23 to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment alleging that  
24 the defendant currency is subject to forfeiture shall be extended to March 6, 2021.

25 Dated: 12/31/2020

McGREGOR W. SCOTT  
United States Attorney

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27 By: /s/ Kevin C. Khasigian  
KEVIN C. KHASIGIAN  
Assistant United States Attorney

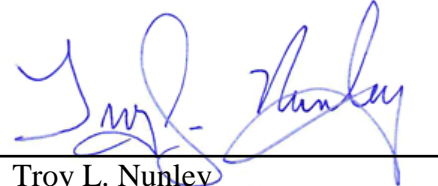
1 Dated: 12/30/2020

/s/ Jacek W. Lentz  
JACEK W. LENTZ  
Attorney for potential claimant  
Tunisha Vance

(Signature authorized by email)

5 **IT IS SO ORDERED.**

6 Dated: January 4, 2021

  
Troy L. Nunley  
United States District Judge